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November 27, 2023

Filed via ECF

United States District Court
Southern District Of New York
500 Pearl Street, Room 1910
New York, New York 10007

Attn: Honorable Denise Cote
United States District Judge

Re: In the Matter of: THE HONORABLE MINISTER LOUIS FARRAKHAN AND THE NATION OF ISLAM, Plaintiffs, v. ANTI-DEFAMATION LEAGUE, JOHNATHAN GREENBLATT, individually, and in his official capacity as CEO and National director of the ANTI-DEFAMATION LEAGUE, SIMON WIESENTHAL CENTER, and ABRAHAM COOPER, individually, and in his official capacity as Director of Global Social Action, Defendants.

Civil Action No.: 1:23-cv-09110-DLC,

Honorable Judge Cote:

The undersigned represents Defendants **SIMON WIESENTHAL CENTER, and ABRAHAM COOPER, individually, and in his official capacity as Director of Global Social Action, only**, in the within action.

Pursuant to your Individual Practices in Civil Cases at Paragraph 1.E. I write to you on behalf of Defendants **SIMON WIESENTHAL CENTER, and ABRAHAM COOPER, individually, and in his official capacity as Director of Global Social Action, only**, to request an extension of time to prepare an answer or otherwise act with respect to the Complaint and Amended Complaint in the within action through and including December 18, 2023. The undersigned office had been recently retained to represent the aforementioned Defendants. A response to the Complaint is presently due December 5, 2023, with regard to Defendants Cooper and Simon Wiesenthal Center. The original due dates for the Answer on behalf of Defendant Cooper was November 13, 2023, and with regard to Defendant Simon Wiesenthal Center was November 14, 2023. The Court granted the first request for an extension.

This is the second request for an extension of time to answer or otherwise act on behalf of the aforementioned Defendants. Plaintiffs, by Lead Counsel Abdul Arif Muhammad, Esq., have consented to an extension to December 12, 2023, in response to our request for a 17 day extension to December 22,

2023. The basis for this application is the substitution of counsel and the time necessary to effectuate the substitution and for substituted counsel to come up to speed on the matter. The stated basis for the objection by Mr. Abdul Afir Muhammad is that plaintiffs' counsel previously agreed to an extension and, therefore, was only comfortable agreeing to an additional seven-day extension to December 12th and unwilling to compromise on a date between December 12th and December 22nd. Therefore, we propose and request a reasonable compromise of an extension to December 18, 2023.

The extension to December 18, 2023, for Defendants SIMON WIESENTHAL CENTER and COOPER to answer or otherwise act with respect to the Complaint and Amended Complaint will not affect the schedule of this litigation where the next scheduled date is the Initial Pre-Trial Conference scheduled for January 4, 2024 at 2:30pm.

For the foregoing reasons, the undersigned, on behalf of Defendants **SIMON WIESENTHAL CENTER and ABRAHAM COOPER, individually, and in his official capacity as Director of Global Social Action**, requests an extension of time to respond or otherwise act with respect to the Complaint and First Amended Complaint in the above-captioned action up to and including December 18, 2023.

Respectfully Submitted,

LONDON FISCHER LLP



Robert D. Martin

cc: CoteNYSDChambers@nysd.uscourts.gov

Abdul Afir Muhammad, Esq. (Via ECF and Email)
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Adam Ivan Rich, Esq. (Via ECF and Email)

An answer or responsive
filing is due 12/12/23.
There shall be no
further extensions.
Yours etc
11/28/23